From: Egan, Patrick [egan.patrick@epa.gov]
Sent: 11/9/2022 7:23:42 PM
To: Sullivan, Melissa [sullivan.melissa@epa.gov]; Hull, George [Hull.George@epa.gov]
Subject: RE: Data question about pollutant reduction figures in ECHO database

Here you go Melissa.

There are a few reasons for null values in the AVERAGE_ANNUAL_VALUE column in the CASE_ENFORCEMENT_CONCLUSION_POLLUTANTS.csv table. The CASE_ENFORCEMENT_CONCLUSION_POLLUTANTS.csv table doesn't include records where the state was the lead agency on the enforcement action and the bullets below apply to federal enforcement actions.

- The enforcement action was resolving a violation that doesn't readily translate to a pollutant quantity.
    - Starting in FY2012 quantifiable benefits are measured and reported in three categories of complying actions:
        - 1) Removal and Restoration,
        - 2) Reduction of Ongoing Releases, and
        - 3) Prevention of Future Releases.
        - There is a fourth category, Work Practice Standards, for which quantifiable benefits are not reported. Work Practice Standards include actions like environmental management reviews, financial responsibility requirements, labeling/material management, permitting etc. While a specific pollutant might be the target of the work practice standard, the remedy or complying action will not result in a direct or preventive reduction, or restoration or removal of pollutants; therefore, no quantifiable benefits are reported.
- The enforcement action type might be penalty only.

Guidance on how EPA calculates the environmental benefits of enforcement actions has evolved since EPA issued the first Environmental Benefit Guide in 2001. This guidance is periodically updated and the most current guidance is from 2021 (Guide to Calculating Environmental Benefits from EPA Enforcement Cases). For more detail on how EPA currently calculates the environmental benefits of enforcement actions, please see the Guide to Calculating Environmental Benefits from EPA Enforcement Cases.

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From: Sullivan, Melissa <sullivan.melissa@epa.gov>
Sent: Wednesday, November 9, 2022 10:52 AM
To: Hull, George <Hull.George@epa.gov>; Egan, Patrick <egan.patrick@epa.gov>
Subject: RE: Data question about pollutant reduction figures in ECHO database

Good morning George and Pat,

Checking if we are on track for a response by COB today for this one.

Thank you,
Melissa

Melissa A. Sullivan (She/Her/Hers)
Office of Public Affairs
U.S. Environmental Protection Agency
202 913 3840
Sullivan.Melissa@epa.gov

From: Sullivan, Melissa
Sent: Monday, November 7, 2022 9:49 AM
To: Hull, George <Hull.George@epa.gov>; Egan, Patrick <egan.patrick@epa.gov>
Subject: FW: Data question about pollutant reduction figures in ECHO database

Good morning George and Pat,

We received an inquiry from Public Health Watch about pollutant reduction figures in the ECHO database.

Inquiry:

I'm a reporter with Public Health Watch, and I have a question about some ECHO data. Specifically, I'm looking at the CASE_ENFORCEMENT_CONCLUSION_POLLUTANTS.csv. In the column AVERAGE_ANNUAL_VALUE (the average annual amount of pollutant reduction as a result of the enforcement action), there are some rows with blanks. I just want to clarify what those blanks mean — if they mean "0" or something else. I've attached a picture of some examples of these in the csv.

Deadline is COB Wednesday.

Thank you,
Melissa

Melissa A. Sullivan (She/Her/Hers)
Office of Public Affairs
U.S. Environmental Protection Agency
202 913 3840
Sullivan.Melissa@epa.gov

From: Savanna Strott <sstrott@publichealthwatch.org>
Sent: Monday, November 7, 2022 9:39 AM
To: EPA Press Office <Press@epa.gov>
Subject: Data question about pollutant reduction figures in ECHO database

Hello,

I hope you and your team enjoyed your weekend.

I'm a reporter with Public Health Watch, and I have a question about some ECHO data. Specifically, I'm looking at the CASE_ENFORCEMENT_CONCLUSION_POLLUTANTS.csv. In the column AVERAGE_ANNUAL_VALUE (the average annual amount of pollutant reduction as a result of the enforcement action), there are some rows with blanks. I just want to clarify what those blanks mean — if they mean "0" or something else. I've attached a picture of some examples of these in the csv.

Would you be able to give me this response today? If that's not possible, receiving the answer tomorrow or Wednesday works for me, too.

Thank you for your help on this!
Savanna

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Savanna Strott
Contributing Writer